

May 9th, 2013

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

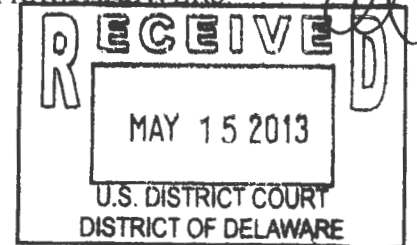
KAROLINA KARPOV,
Plaintiff,

Civil Action No.
12:1411-GMS

-against-

SVETLANA KARPOV
Defendant.

ANSWER TO PLAINTIFF'S
MOTION TO STRIKE ANSWERS



TO THE COURT AND THE PLAINTIFF,

In reference to the latest motion filed by plaintiff, it is clearly seen that last desperate attempts are made in order to keep this case going. Please refer to all plaintiffs' strikes. All she has to say in reference to both defendants is that I and my husband are "characterizing her as a liar".

In reality, plaintiff's allegations are all lies. Her accusations are monstrous and keep growing. Plaintiff had a problem with lying throughout childhood, teen years, and now as an adult and I know this because I am her mother and raised her. As for her foster mother and father, Annya and Yaroslav Gorbatiye, they are subject to perjury in reference to the affidavits they wrote. Please refer to Exhibit A; a letter from Annya Gorbataya dated January 26th, 2002. Annya Gorbataya writes a letter stating how they were living, and thanking us for helping them as well as stating how to discipline Karolina. At the time that Vladimir and I were adopting Karolina, the Gorbataya family lived in conditions well below the poverty level, more like third world country poverty. The hut they lived in had mud floors and the interior walls were made of mud and straw while the exterior was brick. To hide the mold

and cover the mud floors, Annya and Slavic Gorbatiye would hang carpets up on the walls and stretch carpets out on the floors. There was constant humidity and mold was always prevalent. There was no running water and there was barely any lights, dim atmosphere, terrible wallpaper in some areas of the walls, and I as well as many others who visited their dwelling area, can attest to this. Upon my asking Annya Gorbataya why she and her husband would not adopt Karolina, she told me that they could not. Karolina had to retain a foster child status and could not be adopted by their family because the living conditions that were required by the government to adopt a child were not met and the only legal way they could keep Karolina in their home was for Karolina to remain as a foster child.

What absurdity! Modern appliances and luxuries?! This is hilarious actually, such lies. (This creative description shows Vera Lomtevas' terminology). The bicycles and whatever else they are claiming to have had, came from garbage dumpster from Germany. When Slavic Gorbatiyy would transport cars from Germany to Ukraine, they would pack the vehicles with whatever they could salvage from the garbage dumpsters as well as second-hand shops. The affidavit Annya Gorbataya has submitted with the most recent motion is all a lie. Annya Gorbataya explains in Exhibit A how she treated and disciplined Karolina as a child. Exhibit B shows a letter and translation from Nina and Anatoliy, Annya Gorbataya's sister and brother in law. Please reference it. They also depended on people's donations. Exhibit C is a letter from Annya Gorbataya also and shows that they had barely any finances for survival. Annya Gorbataya had to sell perogies at a flea market for a long while in order to survive until Slavic was able to travel to other countries to try and

find a job. The Gorbataya family heavily depended on donations and could not afford even the most simple life essential items. There was no good life that Annya and Slavic Gorbatiyy claim to have had in their affidavits. It was dreadful, horrendous, and plain sickening to see people living in conditions such as they did. The bogus allegations that Annya Gorbataya claims against Vladimir and I are outrageous. The extremity that Annya and Slavic Gorbatiyy would take to lie to court is completely shameful.

Exhibit D- This is a heads up message I received by Skype from Vera Lomtevas's sister, Luba. Vera and Peter Lomtevas, who are ghost-writing for plaintiff as well as advising her, keep in contact with Luba Bayko and Luba felt it necessary to write to me and let me know what their communication is about. Please take this into consideration and take notice that we do not have an attorney and are pro se, but Vera and Peter Lomtevas lie to everyone, making people believe that we pay attorneys to help us fight this case, thus Luba is referring to an attorney in her message. This exhibit proves the vengeful conspiracy that Vera and Peter Lomtevas have concocted and to get to their point of cashing in at millions of dollars, they are manipulating and using Karolina Karpov who is now of course, brainwashed by them and will do everything they say. Karolina Karpov is a victim, but not victimized by me. Sadly, she is exploited and victimized by Vera and Peter Lomtevas.

As for Annya and Slavic Gorbatiyy, they do not proficiently speak, read, or write in English. Everyone knows that. They have been, for years, under heavy influence of Peter and Vera Lomtevas. All their documents are prepared by Vera and

Peter Lomtevas and therefore should be subject to extreme negative scrutiny. Also, by the letters provided as exhibits, it is clearly seen that the relationship between Annya and Slavic Gorbatiye and Vladimir and me was not as they describe it now. The difference occurs because of Peter and Vera Lomtevas' influence and brainwashing as well as plaintiff's lies. Please refer to Exhibit G. This exhibit is an official declaration that Annya Gorbataya, on her own free will, states that she gives her full approval for the adoption of plaintiff. Please refer to it. This document serves as proof that the adoption was peaceful and completely legal. Please note that this is the first document, which was executed by Annya Gorbataya to the adoption of Karolina Karpov. Annya Gorbataya was the initiator of the adoption process both in the legal aspect as well as the civil. For Annya Gorbataya to send Karolina to United States of America before they would immigrate, this was the perfect time. There would be no other legal way for Karolina to come to America as a foster child since only adopted children had the right to leave the country with their adoptive parents, and Annya Gorbataya could not leave Karolina in Ukraine as it would impose guilt on her conscience.

Also, calling out plaintiff for all the lies she is writing in her motions and characterizing her as a liar is not absurd at all. What can you call a liar if not a liar? Should there be some synonym to replace that word because it seems too harsh, scandalous, or inappropriate? A fact is a fact. There's no way around it and if plaintiff is trying to strike my answers as well as my husbands, just because it characterizes her as a liar, than there is a problem. The problem is plaintiff and her "witnesses" such as Annya and Slavic Gorbataya are lying under oath.

Let it be known, that I, Svetlana Karpov, am affirming that all my answers and motions have been honest and forth going from first to the last. Due to the fact that Peter Lomtevas is still keeping up with ghost-writing and advising plaintiff in all her motions, it is absurd that this case be furthered. (Please refer to Exhibit F- Brief to the Appeal court) Reciting paragraph 9 – “The child sex victim has to tread carefully who counsels and advises her,” clearly states that plaintiff is having help in this case. Also, plaintiff’s allegations are inconsistent. First she claims that “Svetlana beat me.” Then she claims that “Svetlana beat me with telephone cords,” and then its “appliance cords”. The story just grows and grows.

I am not guilty of any of these monstrous allegations and the sealed documents where plaintiff (at the age of 13) gives a testimony back in 2007 to a government official about “what happened” clearly states, “Victim stated... events... occurred...when.. the wife was not in the house.” Now “Svetlana knew,” and “Svetlana covered up his (Vladimir’s) acts,” and “Svetlana beat me to stay quiet.” All these accusations can be at once refuted by one document- a testimony. Karolina claims to have been sexually assaulted by Vladimir. I never sexually, physically, or in any other form or manner assaulted her. There is ABSOLUTELY no reason why I should be involved in this case. IF need be, and the court will request the documents, I will provide the court with them.

In reference to Exhibit G of plaintiffs Motion to Strike Answers, I would like to note that this is just absurd. This is not counted as medical evidence. Medical evidence for proof of rape should be dated somewhere around 2007, when she left our home, not March 2013. The medical services provided for Karolina Karpov

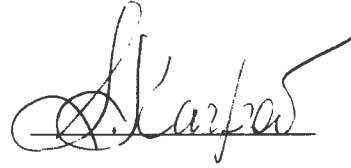
began in February 2012. This exhibit should be thrown out of court. It has been more than 7 years that Karolina Karpov has not been under my care and in that time, anything could have happened to her. Unfortunately, plaintiff could have been raped numerous of times by who knows who. According to plaintiff's writings through Facebook to Kristina Multani, who was a part of this case for a short time, Karolina mentions that "the owner tried forcing me to give him head smfh". Obviously plaintiff has had sexual encounters since she left our home and she cannot prove that rape occurred by defendant Vladimir Karpov in child hood with a paper dated 2013 and with medical help beginning 2012. This exhibit proves nothing and is not legitimate for this case.

Also, in the Appeals Court, plaintiff is asking to transfer the case back to New York. This is because Peter Lomtevas not only has experience in court, but also he may have connections. The transfer of this case though is highly unlikely since the alleged acts happened in Delaware and New York has no jurisdiction to hear this case as defendants do not qualify for jurisdiction under the New York State District Court. Notice that all motions in district court and especially the latest which was sent to the appeals court (Exhibit F), is written professionally, in correct format, and is beyond what any 19 year old without law college education can do.

Please refer to Exhibits H, I, J, and K for reputable references towards who I am. The people writing these references are professionals in all scopes of careers. Upon requesting these reference letters the referees were not aware what these were going to be used for. Obviously I am not the character described by Vera, Peter Lomtevas and plaintiff Karolina as well as Gorbataya Annya and Gorbatiy Slavic.

Dated: SET FORTH Lincoln, Nebraska

May 9th, 2013

A handwritten signature in black ink, appearing to read 'S. Karpov', written over a horizontal line.

SVETLANA KARPOV

Affidavit of Service

I, Svetlana Karpov, am affirming that I have prepared and mailed this answer to:

1. The United States District Court of Delaware
J Caleb Boggs Federal Building
844 North King Street
Unit 18
Wilmington, DE 19801-3570
2. Plaintiff, Karolina Karpov
305 Mill Street
Apt 2A
Poughkeepsie, NY 12601
3. Defendant, Vladimir Karpov
433-133
1181 Paddock Road
Smyrna, DE 19977

EXHIBIT A

Greetings to all of you in the love of our God, Jesus Christ. Greetings dear Svetlana, Vladimir, children, and your parents. We have received your letters and we are very thankful. By God's grace, we are alive and well... to this time I am still using the breast pump, the one that you gave me. (I left her my breast pump on a visit in 2001 upon discovering that she had a surplus of breast milk and was suffering tremendously being unable to discharge it. Breast pumps were rare in Ukraine, and Annya Gorbataya did not have one.)... Svetlana thank you and God for the package- the coat really fit Olya and it is very warm, we did not have a coat; God took care of even this, touching your heart to send it. It will be good for another 2-3 years. It is a little too big, but that is good. The dresses and the leggings fit the girls- they are very pleased. They now attend church in only those clothes. *(The Gorbataya Family was so poor, that they didn't even have formal and winter clothing.)* Thank you for everything... I see now that my children miss Karolina and how overjoyed they are that Karolina wrote to them. I cannot describe this in words... *(letter was left unfinished, and at a later date, Annya Gorbataya kept writing the letter)* Svetlana, I received more letters from you and I sat down to finish writing you this letter. Svetlana, in my house if I gave a chore to them that should be completed together *(referring to her children and Karolina)* she *(referring to Karolina)* would dodge the chores and she *(Karolina)* did not exert herself to complete them. Because of this, I began to give them chores that they have to complete on their own and I checked how every chore was complete and there was always punishment for laziness, for sloppiness, and with this I developed fastness in completing chores. I did have to punish for slowness, not as much slowness, but more for being irresponsible. I always had to be with a switch to goad... Svetlana, do not be afraid to give her *(Karolina)* punishment. There are children that understand when they see the belt and there are those that only understand after you give them the belt... Same with Karolina, give her a chore and about the chore, ask from her and try to give her what she does not like to do so that she would learn how to love work. Svetlana, she *(Karolina)* really wanted to come to you in America. I had very strong control because if you give her some lax, then it is difficult to put her back in her place- you see it yourself. I know that she has much good in her, but also bad... She understands only when you give her some belt- only when there are lines on her bottom. Maybe this is brutal, but children are different. My Liya was like that, she was younger and on her bottom, the lines never faded from the switch. Now I see the result. Turns out, she *(Karolina)* left from us and went to you, and there she can be cunning... I always check myself, maybe I was very strict and cruel in disciplining her, but I did not have any other choice. I tried many different ways but in those moments, I did not find any other way... I will finish- forgive us where we wronged you but I love all of you and God sees how precious you are to me, Svetlana. God keep your family, children, and parents. Family Gorbatyy. January 26th, 2002.

Per avion

адреса відправника, індекс

75100

Україна Херсонська
м. Ізюмський
м. Житомир 140а
Горбатий Анне В.



Америка.

Адреса одержувача, індекс

Mr. Vladimir Karpov
482 W Chestnut
Hill Rd
Newark, DE 19713

офіс

3-25-02

Ув:

Зазначення п'ятизначні
пересилання писем

Поиск



© Фабрика конвертів АТ «Конві». Україна, Київ.

Приветствуем вас всей
любовью Белого нашего Иисуса
Христа. Здравствуйте дорогие
Светогла, Вова, детки и ваши
родители. Толкуем от вас
письма, и очень благодарны.
по милости Божьей мы живы и
здоровы.

Дети послали на музыку,
а Анкета с Эльвирой заснули и
я решила немого поспать,
пока есть возможность и никто
не мешает. Эльвиру всё ещё

до сих пор еще пользуюсь
молокоотсосом тем что мы
дали,

Светогла спасибо вам и Богу за
передачу, куртка очень хорошая
Они и она очень теплая, у нас
не было куртки а Бог и это
усмотрел побудив ваши сердца
вспомогая, теперь на 2-3 года
хватит, она ещё даже вымолит но
это очень хорошо и девочкам
подарили платья, мальчики
они очень добрые и в собра-
нии только в тех вещах
ходят спасибо вам за все

Света не бойся, ни давай
ей, еоп дери похити, ахотес толь-
ко видя козгу, но ахотес ахотес не
дали решит.

[illegible][illegible]

не проходила. И сейчас и
всегда будет. И сейчас она
уже не и была
а там и можно купить

Я все время проверяю себе, что
мне надо и что мне нужно и
что мне нужно. Но я не
не могу сказать, что я все
уже проверю, но в том смысле
глубоко способа я не нашла.

И вот сейчас я уже знаю
что мне надо и что мне нужно
и что мне нужно. Но я не
не могу сказать, что я все
уже проверю, но в том смысле
глубоко способа я не нашла.

С. Горбачев 26.05.2002.

EXHIBIT B

Greetings dear Vladimir, Svetlana, and all your children. With lateness, but I write to you a letter of thanks. A big thank you for the help which you have given to me. For us this was a big support. Thank God that he endeared your heart to mercy. In our time, not many have this gift. We are all alive and well and wish you the same. We are slowly working but we are counted as unemployed but we don't sit without work. I do not want to describe anything because you have already seen our life... I will not complain about anything though... Let God bless you and reward you one hundred score... Good bye... your friends, Nina and Anatoliy.

Ps. Hello from Annya (Gorbataya) and her family.

Здравствуйте дорогие Владимир,
 Светлана и все ваши детки!
 Хотю с поздравлением, но пишу вам
 благодарственное письмо.
 Большое спасибо за помощь, кото-
 рую вы мне оказали. Это для нас
 было большая поддержка. Слава Богу,
 что вы рассмотрели наши серри-
 ous miseries. В наше время мало
 кто трудится эти деньги.
 Мы все очень здоровы чего и вам
 желаем. Ятисонку трудился как
 могем. Хотю мы все считаемся
 безработные, но без работы не сидим.
 Я мечте не хочу сменить, так
 как нашу работу вы сами видите,

~~_____~~
~~_____~~
 Но надеюсь я не на это не буду,
 а только Благодарение Богу, за

[REDACTED]

А все всах пусть Господь
благословит и пошлет еще больше.

во что крест.

[illegible]

~~Анна и Анатолий~~
~~Тысяченко~~

По выданию

Оставайтесь с Господом!

Ваши друзья Тысяченко
Нина, Анатолий.

Привет вам от Анны и
её семьи.

EXHIBIT C

Greetings to all of you with the love of God, our Jesus Christ. Greetings dear family, Svetlana and Vladimir. I could not send this letter out to you. I wrote it a while ago but I could not buy the envelop. Please excuse us. All of our finances were gathered for Slavic's journey to Portugal... Later I will inform you of how he found the job and how he is performing. He is still on his way... Right now it is difficult for me without Slavic, a big burden... We do not have any other way out. Maybe I will again bake perogies to sell so that we have some money for life. (Annya Gorbataya sold all kinds of pastries in Ukraine, and sold them in all types of weather to make some money for living.)... God be with you. May God keep you, with love to all of your family, Annya (Gorbataya). March 3rd, 2002.

Здравствую вас всех любовью
Господа нашего Иисуса Христа,
Здравствую дорогие все ваша
семья Светогла и Якова. Все не
как не много написать вам письмо
написано его уже давно, но конверт не
много купил Извините нас Все друзья
мы собирались Славину в дорогу на
Португалию, ~~но не успели~~
потом еще написали как он устроился
и начал работу. Еще он в дороге

Сейчас мне труднее без Славки

другого выхода нет. Наверное опять буду
наша пиroteчки и продавать, чтобы хотя
были деньги на жизнь.

Бог.

Оставайтесь с Богом.

Да хранит вас Бог
с любовью к вашей
всей семье Аки,

Июль 2002г.

EXHIBIT D

Greetings Svetlana, Vladimir, children, and parents. I decided to write you a letter... Today is Sunday, December 9th (2001)... Svetlana and Vladimir, thank you for the help in reference to Danichkini (Danichkini Family is Annya Gorbataya's sister Yelena, her husband Victor and 2 children.) that you have applied for all the documents and they will be soon leaving (Ukraine to immigrate to America). We are thinking about everything with Slavic- what to do and how to live. Right now there are new laws which make transporting cars from Germany (to Ukraine) not profitable. There are many (tariffs) fees on the borders and there is no profit... In our church a brother left to Portugal to earn money and he works there but does not receive much (pay). He is learning the language ... but still (his situation) is better than ours. We would like to try this as well (send Slavic to Portugal to earn money)... Later, December 10th, 2001 Good bye, God keep all of you. Family Gorbataya.

Украина 751017
Персонека обл.
г. Цюрупинск
ул. Нижняя 140А
Горбачев.

Par avion



Америка.

DE 19713

482 West Chestnut
Hill Rd Newark
Vladimir Karpov.

Приветствую вас Светлана
Руба, давай и пообщаемся. 12/9/01

Решила написать вам письмо -
40. ~~Секретная информация~~

Сегодня, воскресенье 9 декабря,
~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Секретная информация~~

~~Света и Вова спасибо вам~~
~~за заботу по отношению~~
~~к Данишкиным, это во~~
оформили документы и они
уже скоро будут выезжать.

Мы сейчас всё обсуждаем со
Славиком, это дело и как
дальше жить. У нас сейчас
такие внешние законы, это
с Терешкиной нет вывоза точек
машин, очень много по гра-
нице надо платить это нет
вообще вывоза, это они делают;
так чтобы наши советские
машинки покупали, а ин-
марку если хотим то госу-
дарству плати большую сумму.
У нас с церкви всекал на
заработки брат в Португалию
и работает там, получает

пока не очень легко, но все
идет еще лучше ~~потому что~~
~~потому что~~ но все-
равно лучше все у нас. Так
и мы хотим погребовать
море, чтобы Свободы поехал
на заработки. ~~потому что~~
~~потому что~~ ~~потому что~~
~~потому что~~ ~~потому что~~
~~потому что~~ ~~потому что~~
~~потому что~~ ~~потому что~~

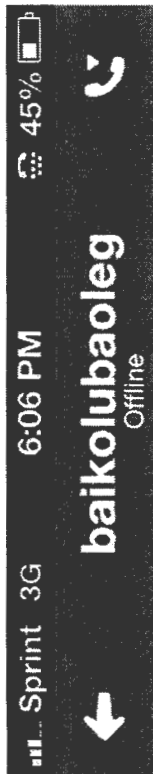
Трогательная нисаь 10.12.2001г.

[illegible]

Оставайтесь с Господом
Досвидание.
Да хранит вас всех
Бог.

с. Горбаток.

EXHIBIT E



 Conf started April 11, 2013 1:20 PM

 Conf ended April 11, 2013 1:20 PM

baicolubaoleg

Света.Твой адвокат

бессовестно „доит,,тебя ,ничего не
решая.Сейчас возникла угроза,что ты
можешь лишиться свободы...Примириись с
Верой Ломтевас,решите вопрос мирным
путём.Мы не хотим чтобы твои дети
лишились ещё и мамы...Олег и Люба
Байко.

 Type message here

Recent

April 11, 2013 1:20 pm.

SVETLANA, YOUR ATTORNEY, DECEITFULLY,
IS "MILKING" YOU, NOT SOLVING ANY PROBLEMS.
RIGHT NOW THERE IS A THREAT, THAT YOU MIGHT
LOSE YOUR FREEDOM... RECONCILE WITH VERA
LOMTEVAS, SOLVE THE PROBLEM IN A PEACEFUL
WAY. WE DO NOT WANT YOUR CHILDREN TO BE
LEFT WITHOUT A MOTHER AS WELL... OLEG AND LUBA
BAYKO.

EXHIBIT F

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

Case Number: 13-1643

Case Name: Karolina Karpov v Vladimir Karpov and Svetlana Karpov, (1-12-cv-01411)

INFORMAL BRIEF

DIRECTIONS: Answer the following questions about your appeal or petition for review to the best of your ability. Use additional sheets of paper if necessary. You need not limit your brief solely to this form, but you should be certain that any brief you file contains answers to the questions below. The Court prefers short and direct statements.

I. OPENING STATEMENT BY KAROLINA KARPOV

1 Words cannot express the horror I endured being repeatedly raped by Vladimir Karpov from my seventh year to my fourteenth year of life living in Delaware. The District Court found the words. The District Court wrote that Vladimir "sexually abused" me during my "tender years" and in a footnote said that Vladimir was "convicted as a result of his abuse". The understatement here is incredible. For his punishment, The District Court footnoted that Vladimir is "serving a sentence and incarcerated". I filed two motions for a preliminary injunction to stop defendants from transferring their property while this case is moving to trial. The District Court said I "demonstrated a likelihood of success as to Vladimir", but that "I did not carry" my "burden of proof". The District Court minimized the facts in my complaint by entering its order and memorandum (on February 20, 2013) even though defendants had not yet filed an answer after given two opportunities to do so (on March 2, 2013).

2 Reciting the details of Svetlana Karpov's striking me with appliance cords fills my mind with anguish. The District Court summed it up in a few words by saying "Svetlana beat her for complaining of the abuse". There is no other mention of what happened to me in the District Court's Memorandum. The rest of the Memorandum was about Peter Lomtevas, my uncle.

3 Child sex victims are not ordinary litigants who bring trivial complaints. I was imported into the United States as a prepubescent minor by the defendants for the express purpose of sexually gratifying Vladimir Karpov. Svetlana planned my removal from my country of origin, kept me under control in her home and worked hard to keep the whole thing a secret. Here are procedural rules that make suing these people a challenge.

4 The child sex crime victim has to file in the perpetrator's venue to preserve the perpetrator's due process. Fed.R.Civ.P. 12(b)(2) and (3). See D.I. 7, 11, 12, 13, 14.

5 The child sex victim has to wait for a scheduling order or conduct a scheduling conference to serve and enforce discovery upon her rapist. Rule 26(a)(1)(C). Svetlana and Vladimir sought additional time in motions not provided to the child sex victim to answer and retain counsel which was granted more than once. See D.I. 26, 30 and D.I. 46 at page 9 of 10.

6 The child sex victim has to wait for referral for pro bono representation. See D.I. 24.

- 7 The child sex victim does not yet have a judgment upon which to stay the perpetrators' transfers of property. Rule 65(a). The child sex victim has to make a "clear showing" of irreparable injury. *Glasco v. Hills*, 558 F.2d 179, 181 (3d Cir. 1977), a case about an apartment complex.
- 8 The child sex victim is prohibited from obtaining her own criminal court file which contains proof of her physical and psychological make up at the time of the perpetrator's arrest. (See D.I. 31). The law prohibits disclosure of these proofs because of prosecuting attorney privilege and work product even though these are the child victim's documents. Rule 26(b)(1).
- 9 The child sex victim has to tread carefully who counsels and advises her. See D.I. 46 at page 7; footnote 1. Any lawyer better not assist the child sex victim in a "ghost-writing" capacity to put into print her words which "chronicle a shocking and heinous course of child abuse" by the child rapists. On the question of privilege, Delaware's Justice Department invokes privilege and attorney work product as their basis to prevent disclosure of the child rape victim's medical and psychological reports and records made at the time of the rapist's arrest. Is the child sex victim required to divulge her privilege and the prosecutors not? Is the prosecutor turning coat and defending the rapists now?
- 10 The child sex victim gets no funding to pay for her case. The child sex victim has to turn to family members to serve papers and pay taxi because process servers cost money and because gasoline is expensive. The child sex victim's uncle who practices law in New York City figured prominently in the District Court's Memorandum. The District Court wrote the uncle attorney, Peter Lomtevas, had better stop assisting and reveal himself or he faces professional sanctions. Aunts who served papers were accused of harassing Emily Karpov, a Karpov daughter, who was briefed to hold her arms behind her back and refuse to "accept" the papers, who was the only Karpov left in Karpov's Delaware home after Svetlana fled to Nebraska. Emily filed a motion for a protective order against the aunts and uncle accusing them of harassment. This order can be used to cause future arrests of the child sex victim's assistants who arrive to serve papers.
- 11 Defendants are millionaire real estate owners who stand to save all their holdings and this appeal must change that.

II. INFORMAL BRIEF

1. **Jurisdiction:** What order(s) of the district court or agency are you appealing?
- 12 I am appealing Judge Gregory Sleet's Order (the "Order") dated February 20, 2013 (and his Memorandum of the same date) denying my motion for a preliminary injunction (See paragraphs one and two of the Order). D.I. 46.
- 13 I base this appeal on 28 U.S.C. § 1292(a), which provides: "courts of appeals shall have jurisdiction of appeals from: (1) Interlocutory orders of the district courts . . . granting, continuing, modifying, refusing, or dissolving injunctions."

What is the date of the order(s)?

February 20, 2013.

When did you file your notice of appeal or petition for review?

I filed my Notice of appeal ten days after Judge Sleet's Order (March 1, 2013).

2. Statement of the case: Explain the proceedings in the district court or before the agency (i.e. what the district court or the agency did in deciding your case).

14 After seven years of sexual assault and four more years to reach adulthood, I filed my Complaint in the Southern District of New York on May 4, 2012 under Docket No. 12-CV-3649. I filed for and obtained an order granting me poor person relief May 11, 2012. I served the defendants by personal service. Defendants filed motions to dismiss on July 11, 2012. I opposed on July 30, 2012 and by August 12, 2012, defendants filed their reply. The District Court in the Southern District of New York denied dismissal of my action and instead transferred it to the District of Delaware by Order dated October 23, 2012. That order included a statement of a concern the court had about me proceeding pro se and requested of the Delaware court to assign counsel to assist me in the presentation of my case.

15 The Delaware District Court entered an order staying my case pending assignment of pro bono counsel. I filed a motion on December 26, 2012 for an order enjoining defendant's sale of one of their properties publicized on December 1, 2012. Then I filed a motion enjoining sale of any of defendants' other properties. The court lifted the stay on January 11, 2013. I filed a motion to add defendants and for substitute service February 2, 2013. I filed a motion to compel production of documents by the Delaware Department of Justice on February 10, 2013. Anything I asked for was denied.

16 There is an undercurrent. The memorandum makes clear Svetlana visited the District Court and filed papers without copies to me. The memorandum warns both sides to show proofs of service of filings and orders a halt to litigant visits to the courtroom. I never appeared in court and never filed anything without serving copies to defendants. Svetlana caught the court's attention that my uncle is ghostwriting my filings. The court turned its attention away from my rapists and toward my attorney uncle. The District Court is following Svetlana's accusation that Peter Lomtevas is ghostwriting and based upon those accusations the court is attacking Peter. Defendant child rapists are getting a liberal pleading standard. They have their unserved motions granted. My statements no longer matter. My uncle better run and hide.

3. Statement of facts: Explain the facts and events that led to the complaint in the district court or the action before the agency.

17 I am the victim of sexual enslavement by the defendants. I detail in my complaint the steps the defendants took in bringing me into the United States from the Ukraine in 2001 when I was a young girl. See my Complaint at D.I. 2, paras. 38 - 42.

18 Defendants brought me into this country so that Vladimir could continue his habit of sexually gratifying himself with underaged girls and so that Svetlana could keep her own daughters safe from Vladimir's sexual urges. See D.I. 2, paras. 43 - 78.

19 Vladimir threatened me to stay quiet. See D.I. 2, paras 79 - 80.

- 20 I explained in graphic detail what he did with me sexually. See D.I. 2, paras 45 - 47, 52, 53, 54, 64, 65, 66, 67, 69, 81, 92. There were many more sexual assaults upon me. I cannot recall each and every detail that took place on each and every day. I was seven years old when Vladimir started groping me.
- 21 Svetlana beat me and had her biological children turn against me and I sought protection from Svetlana. See D.I. 2, paras 83, 86, 88.
- 22 Judge Engelmeyer of the Southern District of New York said my complaint's allegations are "shocking and heinous". See D.I. 2, dated October 23, 2012, page [1].
- 23 Vladimir is currently incarcerated and Svetlana is free. Defendants owned a large real estate business earning large amounts of money. See D.I. 2, para 108, lines a through e and they own several limited liability companies, lines a through c.
- 24 The District Court is prohibiting me from stopping transfers of property by Svetlana and getting financial information about Vladimir and Svetlana's real property holdings and their companies.
- 25 Subpoenas are ignored and no enforcement is available.
4. **Statement of related cases:** Have you filed an appeal or petition for review in this case before? If so, give title of case and docket number.
- 26 No. I have not filed any prior petition for review in this case.
- 27 Do you have any cases related to this case pending in the district court, in the court of appeals or before the agency? If so give title of case and docket number.
- 28 No. I have no related cases pending in the District Court.
5. Did the district court or the agency incorrectly decide the facts of your case? Yes If so, what facts?
- 29 The entire Memorandum misses all facts necessary to make its ruling denying my motions for preliminary injunctions and other motions.
- 30 The facts are that Svetlana removed me from the Ukraine by artifice and trick, D.I. 2 at para 38, made Vladimir my tutor (as a cover up for further sex), D.I. 2 at para 69, beat me physically, D.I. 2 at para 83, 84, 86, told me not to say anything and told me about the law of teachers speaking to children, D.I. 2 at para 87, beat me for insignificant reasons, D.I. 2 at para 88, told Vladimir all the kids know, D.I. 2 at para 95, would not allow public discussion, D.I. 2 at para 96, that her sister Sasha was responsible for sexually arousing Vladimir, D.I. 2 at para 97 and Kristina's motion dated March 7, 2013 at page 9.
- 31 Vladimir started with sexual questions, D.I. 2 para. 43, that I had a problem touching my genitals, para. 44 and began fondling my genitals. Paras. 45 and 46. He began finger insertions, para. 47, and would drag me back into position if I moved away. Para. 52. He started oral sex. Para. 53 and 54. This happened before my tenth birthday. Vaginal sex began. Para 64. My schooling failed. Para. 69 and 78. Schools and churches did nothing.

- 32 Para. 75. I lost the ability to sleep normally. Para. 77. I suffered these sexual assaults until I escaped the Karpov house. Para 104.
- 33 Vladimir was sentenced for Rape 3rd Degree to 12 years at level 5 (prison) suspended after serving 5 years followed by level 4 (halfway House). Next 2 years at level 3 (probation) where he will be monitored by the Adult Sex Offender Probation Unit. D.I. 2, Para. 24.
- 34 Vladimir was also sentenced for Continuous Sexual Abuse of a Child to 7 years of level 5 (prison) suspended after serving 2 years for 2 years at level 3 probation. This probation runs at the same time as the probation for Rape 3rd Degree charge. D.I. 2, Para. 25.
- 35 Vladimir is registered as a Tier 3 sex offender which includes full community notification including his photo being posted on the internet as a sex offender. D.I. 2, Para. 26.
- 36 The District Court devoted few words about what happened to me and a footnote about Vladimir. This leads to a complete misunderstanding of my motions for a preliminary injunction. Why is Vladimir serving time for child rape and why is his wife Svetlana on the run?
- 37 I told her children myself. See D.I. 2 at para 59 as to Olga Karpov, D.I. 2 at para 91 - 93 and D.I. 2 at para 95 as to his daughter Victoria who saw a sexual assault upon me by Vladimir, D.I. 2 at para 96 as to Edwin, David and Kristina. I told Svetlana myself. See Complaint D.I. 2 at para 59 where I told Olga and she told Svetlana, D.I. 2 at para 60 where Svetlana told me she knew Vladimir had "that problem" (referring to pedophilic urges), D.I. 2 at para 63 where Svetlana left for the Ukraine after I told her and left me alone with Vladimir, D.I. 2 at para 87, where I told Svetlana that my school was asking questions.
- 38 I am standing before this Appellate Court asking for a complete change in how a District Court treats child sex plaintiffs and incarcerated perpetrators and their spouses. Additionally, according to the District Court the accusation against an attorney who could help me is greater than the wrong of the incarcerated pedophile. What attorney would ever want to help a child sex victim? Otherwise, it is open season for sex attacks against children with impunity, even approval and protection. Because of all these obstacles set up by the District Court against the child sex victim, the victim is unable to reach out to the court for justice so no laws are available to protect the child sex victim. Vladimir got seven years? Which child stands a chance of a sex-free upbringing?
6. Did the district court or the agency apply the wrong law (either cases or statutes)? Yes
If so, what law do you want applied?
- 39 The District Court picked the wrong law in everything. The court denied my motion for a preliminary injunction specifically and denied my other motions generally using the wrong law. This is because the District Court could not find law available on the books which fit my case. Pedophiles run free because of the lack of laws that protect the child sex victim. Lawyers assisting child sex victims stand to be attacked before the pedophile and his spouse are attacked. Child sex victims get victimized by pedophiles and then get victimized by the court. I want to point out that the system of checks for pedophiles that go to other countries to adopt children is also flawed.

40 The District Court cited to a Supreme Court case where no power exists by a district court to enjoin disposition of one's property by a non-judgment creditor. The basis of this is the court's *cautious approach to expansion of equitable powers which leaves any substantial expansion of past practice to Congress*. The case the court cites is Grupo Mexicano de Desarrollo SA v Alliance Bond Fund Inc 527 US 308 (1999). "Grupo" involved a dispute between an investment fund and a Mexican holding company.

41 Defendants are not a bank. One defendant is imprisoned for child sex crimes and the other is on the run. Both are free to dispose of all their property and end up judgment proof. A bank can be forced to pay on a federal court judgment but defendants can not. Vladimir signed all of his property over to Svetlana and Svetlana is free to transfer it all to others as she has already done while this case proceeds to trial. See D.I. 25 and 27.

42 I am not a bank either. This case is not a dispute about bank funds. This case is an attempt to charge defendants with the permanent support and upkeep of their child sex slave, me. Defendants must disgorge all their property so that tax payers are relieved of victim support and other child sex perpetrators are stopped dead in their tracks. Otherwise all children are victims. I want law applied differently in my case. There are many laws on the books that are supposed to apply to me.

43 The child sex crime victim should not file in the incarcerated perpetrator's venue to preserve the perpetrator's due process. Fed.R.Civ.P. 12(b)(2) and (3). See D.I. 7, 11, 12, 13, 14. He is locked up. He can appear by video in his jumpsuit from his cell. I want my case returned to New York because I was raped in Delaware and my post traumatic stress acts up when I think of Delaware. I have no money to travel from New York to Delaware. All of my medical and psychological resources are in New York. Svetlana moved to Nebraska and their properties are all over this country. I am realizing now that New York is less pedophile-friendly.

44 The child sex victim should not wait for a scheduling order or conduct a scheduling conference to serve and enforce discovery. Rule 26(a)(1)(C). That should happen immediately. A perpetrator should have one chance at answering a complaint. See D.I. 26, 30 and D.I. 46 at page 9 of 10.

45 The child sex victim should not wait for referral for pro bono representation. See D.I. 24. That should happen immediately. Child protective advocates must be appointed immediately. The child sex victim should not have to take charge of her case against her perpetrators. The child sex victim has to relive the sexual assaults again and again and that is debilitating and incapacitating. It is humiliating and embarrassing.

46 The child sex victim should not have to have a judgment in hand in order to stay the perpetrators' transfers of property. Rule 65(a). That should happen automatically. The child sex victim should not have to make a clear showing of irreparable injury as that has already occurred, in this case in 2007 when Vladimir was convicted, and continues to occur because Svetlana is transferring her property. Balancing equities is silly because no one considered my equities while I was a child being raped by Vladimir. I now face economic hardship as does the taxpayer who has to pay for my existence because Svetlana can run away. The public loses and the child rapist wins. That is a major impact upon the public. That is why this case is really Public versus The Karpovs. Every child who is destroyed by childhood rape becomes a public charge.

6

47 The child sex victim should not have to show a reasonable probability of success twice. That was already achieved at the criminal trial. The child sex victim should not have to show that the wife of the perpetrator knew for seven years of child rapes. That should be presumed. The child sex victim should not be prohibited from obtaining her own criminal court file which contains proof of her physical and psychological make up at the time of the perpetrator's arrest. (See D.I. 31). The law should not prohibit disclosure of a child sex victim's proofs because of a prosecutor's privilege and work product. Rule 26(b)(1). The victim must control that privilege.

48 The child sex victim should not endure frivolous conduct by the defendants and their family. The child sex victim should be free to seek out anyone's assistance in her case. See D.I. 46 at page 7. The child sex victim should be the one enjoying privilege and confidentiality. Svetlana has her children bad mouthing my aunts and uncle. See e.g. D.I. 35 and 36. Svetlana's children do not know the truth because the assaults were always one on one and Svetlana lied to her children about what went on. Svetlana is a menace to her own children and Svetlana is unable to raise good citizens.

49 The child sex victim should not have to pay for copies of documents (\$.50 per page) from the clerk of court when a perpetrator fails to serve copies to the child sex victim. See D.I. 46 at page 8 of 10. If a court entertains motions with no notice to the child sex victim, the court should pay the copying fee. The child sex victim should be able to amend her pleadings to include defendants' children when the perpetrators transfer their property to their children as well as the schools, hospitals and churches that took no action and offered no protection against continued sexual assaults and beatings. See D.I. 46 at page 9 of 10.

50 The child sex victim should not reveal her address so the perpetrators know where she lives. See D.I. 46. The child sex victim should not have to divulge who is assisting her and should not have to pass along threats to her uncle. The District Court devoted twelve lines of warnings to my uncle and no lines of warnings to the convicted rapist or his wife. There was more law (three cases and a code section) used in those twelve lines against my uncle than in any other page in the entire Memorandum, D.I. 46 at page 7 footnote. The District court mentions the name "Vladimir" five times in the entire decision and mentions my uncle "Peter" four times on one page. Peter did not rape me when I was a child. The District Court does not use "child rape" or "child sex" anywhere in D.I. 46. The District Court uses "abuse" and "sex crimes" and calls my statements "allegations".

51 I want law properly applied to production of defendant financial documents and privileged investigatory and prosecutorial matter and work product (D.I. 43). This court must rule that investigations of me, of my body and my mind are mine and mine alone. Records of me at my fourteenth year of age will show a jury what state I was in at the time of Vladimir's arrest and hiding these records is a showing of the prosecutor's support for Vladimir and is a showing of me being their adversary. This is what I mean by "pedophile-friendly".

7. Are there any other reasons why the district court's judgment or the agency's decision was wrong? Yes If so, briefly state these reasons.

- 52 The District Court denied my motion to compel defendant's compliance with initial disclosure. Vladimir and Svetlana have produced absolutely no documentation of any kind as required by rules of civil procedure. Even their accountant has failed to produce their tax records by way of a subpoena served personally by sheriff. The accountant listens to Svetlana, not to the District Court.
- 53 The District Court denied my motion to amend my Complaint for the addition of other parties that either hold property or did nothing to help me when I was a little girl.
- 54 The District Court denied my motion to get copies of documents filed by defendants who failed to provide me copies.
- 55 The District Court imposed a discovery deadline of September 6, 2013 while defendants and the prosecutor are not producing any disclosure.
- 56 The District Court cautioned my uncle but nobody cautioned Vladimir not to rape me and nobody cautioned Svetlana not to hide this fact.
- 57 The District Court stayed the matter for assignment of pro bono counsel. I discovered that Svetlana placed her Delaware home for sale. I filed two motions on that issue and the District Court lifted its stay, deprived me of counsel and denied all my motions. So Svetlana runs away whether my case is delayed by a stay or not.
- 58 The District Court denied my motion to compel the State Department of Justice to produce my own records - medical examinations, psychological examinations and other information - for the court in this case. Vladimir states in his Answer there is no "medical proof" of his raping me, See Vladimir's Answer, para. 28. Svetlana says the same thing in her Answer's para. 28. That is because his prosecutors are hiding my records.
- 59 The District Court said I unilaterally proceeded with discovery without a scheduling order while neither defendant has responded to anything. The Court said I anticipate judgment in my favor and an award of defendant's property. That is my aim. Why should taxpayers support me when Vladimir and Svetlana should? By September, Svetlana could transfer or hide all her property and have nothing left to pay or she can go to the Ukraine with her money. So this is really a case of the American public versus the Karpovs and the public is losing right now.

8. What action do you want the Court of Appeals to take in this case?

- 60 I ask the court to enter an order reversing the District Court's denial of my motion to enjoin transfers of all their property by defendants and produce their financial records for all the years I have been raped. Defendants are neither a bank nor an apartment complex. They are private, mobile, naturalized citizens. They can claim poverty without proof. They can ignore a judgment. They can distribute property in anticipation of judgment. I was Vladimir's child sex slave. Slavery was supposed to be abolished in this country. Children are incompetent to consent to sex. I served him involuntarily as his lover and source of sexual comfort at the expense of my physical and psychological well being. All of his property should become mine as a consequence of his actions. I will remain on public assistance otherwise because the damage I incurred will last me my life time. The order of this court should stay any transfers as of the filing date of my

federal action in New York State, May 4, 2012. If any property has already been transferred, I ask that transfer be reversed and any funds involved be placed in escrow.

61 I ask the court to order production of the Justice Department's records and papers pertaining to me. How can I prove my case otherwise? The prosecutor is holding my proofs in her possession and claiming privilege therefore helping Vladimir and Svetlana. The prosecutor is protecting the convict against the victim? What secret is the prosecutor hiding that I cannot see?

62 I ask the court to enforce my requests for defendant's financial information and my subpoenas. I ask that my demands for information be enforced and my subpoena served upon their accountant be enforced.

63 I ask the court to state that child sex victims are not ordinary litigants and that the sentences of criminal courts deserve dignity, credibility and mention in federal court Memoranda.

64 I want venue returned to New York as Svetlana relocated to Nebraska and Vladimir can appear in his jumpsuit by video. Aside from prosecutor's records in Delaware, my current medical and psychological professionals are in New York and I am in New York.

65 I want counsel, advocates, experts and costs paid by Vladimir and Svetlana. I want a Magistrate appointed to manage disclosure in this case. I want the threats against my aunts, uncle and me to stop. I should not have to be doing litigation. I am sick.

66 I want a finding of reasonable probability of success, a finding that I am irreparably injured, that Svetlana knew of, aided and furthered Vladimir as he raped me repeatedly.

67 I want copies of all documents filed by defendants to be presented to me and paid for by defendants. I want to amend my complaint adding Svetlana's children, adding other adults in the home, the church, the schools, hospitals and others who knew of what was happening to me and did nothing.

68 I want Svetlana arrested and prosecuted. I want Vladimir prosecuted in federal court. I want both Vladimir and Svetlana stripped of their citizenship and deported. I want to keep my address confidential. I want to meet a judge in person to see that I am real and I am the one bringing this case against defendants.

April 15, 2013


KAROLINA KARPOV

See Attached Docket Sheet and Notice of Appeal

EXHIBIT G

Ukraine
Executive Community
Local Union of Tsurupinsk
By Gorbataya Annya Veniaminovni

Who lives in the City of Tsurupinsk, Litvinova Street, House #11,
Kherson Oblast.

DECLARATION

City of Tsurupinsk, Year of Nineteen ninety-nine, Month of October, Twenty Sixth Day.

I, Gorbataya Annya Veniaminovna, give my consent to the adoption of my fostered, non-emancipated- Karnawhovo Karolina Pavlivny, date of birth 17th of December 1993 to the citizens of USA- Karpov Vladimir and Karpov Svetlana.

This declaration is written by me knowingly, without compulsion, and without any remuneration.

Signed, Gorbataya Annya Veniaminovna

Year of One thousand, Nine hundred, Ninety nine, Month of October, the Twenty-sixth day, I, Levkivskiy I. P. private notary of the Region of Tsurupinsk, District Notary, witness the true signature of the citizen Gorbataya Annya Veniominovna, which is done before my presence. The identification of Gorbataya A. V. who signed this document, is established.

Registered in the registry under No 2025

Fee: Paid

Private Notary
ABE No 100470

вул. Червоноармійська 31

телеф. 2-36-84

УКРАЇНА UKRAINE



Виконком
Цюрупинської міської Ради
Горбатої Анни Веніаміновни,
що мешкаю в м.Цюрупинську,вул.Литвинова,буд.11,
Херсонської області.

ЗАЯВА

Місто Цюрупинськ,тисяча дев'яносто дев'ятого року,жовтня місяця,
двадцять шостого числа.

Я,Горбата Анна Веніаміновна даю згоду на в дочеріння моєї підопічної не-
повнолітньої-Карнаухової Кароліни Павлівни,17 грудня 1993 року народження,
громадянами США-Карповим Володимиром та Карповою Світланою.

Ця заява написана мною свідомо,без примусу,без отримання будь-якої вина-
городи.

Підпис: 

Тисяча дев'яносто дев'ятого року,жовтня місяця,
двадцять шостого числа,я,Левківський І.П.,приватний нотаріус Цюрупинського район-
ного нотаріального округу засвідчую справжність підпису гр.Горбатої Анни Веніамі-
новни,який зроблено у моїй присутності.Особу гр.Горбатої А.В.,котра підписала до-
кумент,встановлено.

Зареєстровано в реєстрі за № 2025
Стягнуто плати:сплачено

Приватний нотаріус:
АВЕ № 100470



АВЕ № 100470

Увага! Бланк містить багатоступеневий захист від підроблення.

МІНІСТЕРСТВО ЮСТИЦІЇ УКРАЇНИ

EXHIBIT H



Alfred Lerner College
of Business & Economics
DEPARTMENT OF BUSINESS ADMINISTRATION

University of Delaware
Newark, DE 19716-2710
Phone: 302-831-2555
Fax: 302-831-4196

Reference for Svetlana Karpov

TO WHOM IT MAY CONCERN

I am pleased to provide a reference to Ms. Svetlana Karpov.

I have known Svetlana for over thirty years and have met many of her children as well. In all the years I have known Svetlana I have always found her to be a very ethical and highly moral person. In all of my contacts with Ms. Karpov, she has demonstrated exemplary behavior. She is a mother who is completely devoted to her children. She is completely reliable, hardworking, and I am pleased to provide my highest recommendation. If you need additional information, please do not hesitate to get in touch.

Sincerely,

S. A. Billon
Professor Emeritus



Prudential

EXHIBIT I

Fox & Roach, REALTORS®

Newark Sales Office

850 Library Avenue, Suite 106, Newark, DE 19711

Bus 302-368-1621 Fax 302-368-6397

April 24, 2013

To whom it may concern:

My name is Jim Darden. I am a realtor with Prudential Fox & Roach, Realtors. I have been working in the real estate business with Vladimir and Svetlana Karpov for more than 12 years. Mr. & Mrs. Karpov are 2 of the hardest working people I have ever met.

About 12 years ago I met Vladimir Karpov and worked extremely hard with him building his real estate investment portfolio. He worked so hard managing his investment properties, one day I would meet with him and to sell him a property and the next day I'd see him painting, cleaning and repairing his next apartment for rent. He inspired me more than he ever knew. I like to think Vladimir became my friend as well as client. I used to call him on a regular basis just for the inspiration.

Svetlana Karpov, the Flying Nun. She is the wife and mother from heaven. I first met Svetlana 12 years ago. Some way this quiet woman found time to support her husband Vladimir in the real estate business and take care of their 14 children. They worked so hard so that they could keep their children enrolled in a private Christian school. Svetlana was constantly in the kitchen, cooking, cleaning, preparing lunches to go, or folding the next load of laundry.

It is so sad to me to see that people Vladimir and Svetlana tried to help turn on them, and tear apart this family, just because they wanted their money that they worked so hard for to support their family.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Darden", with a stylized flourish at the end.

Jim Darden

EXHIBIT J

**Law Office
James J. Woods, Jr., P.A.
P. O. Box 4635
Greenville, DE 19807
302-893-7585 phone
302-235-5770 fax
WoodsLawDE@aol.com
www.lawyerindelaware.com**

April 23, 2013

To whom it may concern:

I have known Svetlana Karpov for almost twenty years. She is an exceptionally kind, devout, and gentle person. Her dedication to her many children is nothing short of remarkable. No matter how busy she is, she is always thinking of how she can meet each one's needs and make sure all of her children are well. Somehow she manages to run the family apartment rental business simultaneously. Svetlana is not only intelligent and conscientious, but her organization skills are obviously superb. In good times and in bad times, she is the "rock" on whom her children can always rely.

Sincerely,

James J. Woods, Jr.

EXHIBIT K

Esther M. Johnson, CPA

126 Hawley Road
Port Deposit, MD 21904
Tel: 410-378-4261

April 26, 2013

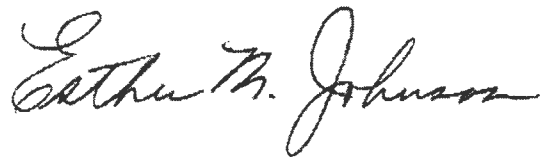
TO WHOM IT MAY CONCERN:

I have had the privilege of knowing Svetlana Karpov for more than twenty years and have witnessed her devotion to her family. She has left no stone unturned to provide the best education possible for her children, including driving many miles each day to transport them to a private school noted for its high standards and academic excellence.

She has nurtured their spiritual growth through faithful church attendance and by her own example of unselfish Christian love and dedication to the principles of her faith.

Svetlana Karpov is a loving mother who puts the interest of her children above all else, and I applaud her for exemplary performance of her role as a mother and grandmother.

Sincerely,

A handwritten signature in black ink that reads "Esther M. Johnson". The signature is written in a cursive, flowing style.

ESTHER M. JOHNSON, CPA

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POSTAGE REQUIRED

From/Expéditeur:

Svetlana Karpov
PO Box 80245
Lincoln NE 68501

To/Destataire:

DAE

P		U.S. POSTAGE
		\$5.60
PM FR ENV		
98501 0006		
Date of sale		
05/11/13		
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08353489		
PSN047600 125609		
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